

RE: CC Docket No. 98-67

Please consider this the response of Michigan Protection and Advocacy Service, Inc. (MPAS) to the Michigan Public Service Commission (MPSC) renewal application for certification of telecommunications relay services (TRS) by the Michigan Relay Center to provide a telecommunications relay service for Michigan citizens with speech and/or hearing impairments. MPAS is the federally mandated system designated by the Governor of Michigan to protect the rights of people with disabilities in the state of Michigan.

It is the opinion of MPAS that, while the submitted application may comply with the Mandatory Minimum Standards of 47 CFR 64.604 in terms of providing public access to information of the availability and use of TRS in Michigan, those standards fall woefully short of adequately providing notification to the Michigan citizens who need the services of TRS - those people with speech and hearing impairments. A person who is not able to use a regular telephone because of the nature of their disability is highly unlikely to access information on the existence of TRS from inserts in a phone bill, reading a phone book, or utilizing directory assistance. Likewise, if such an individual is unaware of the existence of TRS in Michigan, it is unlikely they would access information from the Michigan Relay Center Annual Report, as is noted as another source of public information access in the Certification Application.

MPAS would encourage thoughtful outreach to those entities and sources to which people with speech and/or hearing disabilities can reasonably be expected to have access, such as disability advocacy groups, vocational rehabilitation agencies, professionals who deal with people with speech and hearing disabilities such as speech therapists, occupational therapists etc., and widespread media public announcements. A more directed outreach effort can ensure that the people who need access to TRS are, indeed, being provided with the information they need to obtain the specialized communications systems they require.

Sincerely,

Elmer L. Cerano
Executive Director
Michigan Protection & Advocacy Service, Inc.